



Xtep Group Occupational Health and Safety Management System

2025 Edition

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1. General Provisions

(1) Purpose

To ensure the occupational health and safety of the company's employees in the process of production and labor, prevent and control the occurrence of occupational disease hazards and safety accidents, protect the legitimate rights and interests of employees, and promote the sustainable development of the company, this system is formulated.

(2) Scope of Application

This system applies to all employees of the company, as well as external personnel who enter the company's production and operation premises to engage in related activities.

(3) Basic Principles

- This system applies to all employees of the company, as well as external personnel who enter the company's production and operation premises to engage in related activities.
- The principle of "safety first, prevention first, and comprehensive management", and occupational health and safety management shall be carried out throughout the entire process of production and operation.
- The principle of full participation, where managers at all levels and all employees are responsible for abiding by this system and actively participating in occupational health and safety management work.
- The principle of continuous improvement, where the implementation of the system is regularly evaluated and revised to continuously improve the level of occupational health and safety management.

2. Organizational Structure and Responsibilities

(1) Organizational Structure

The company has established an Occupational Health and Safety Management Leading Group, with the general manager of the company as the leader, the deputy general manager in charge of production as the deputy leader, and members including the heads of various departments. The leading group has an Occupational Health and Safety Management Office, which is located in the



safety management department and is responsible for daily occupational health and safety management work.

(2) Responsibilities

● Responsibilities of the Occupational Health and Safety Management Leading Group

Approve the company's occupational health and safety management policies, objectives, and management systems.

Approve the annual work plan and budget for occupational health and safety.

Hold regular work meetings on occupational health and safety management to study and solve major occupational health and safety issues.

Organize, coordinate, and supervise the implementation of the company's occupational health and safety management work.

● Responsibilities of the Occupational Health and Safety Management Office

Implement national laws and regulations on occupational health and safety and the company's occupational health and safety management system.

Organize the identification of hazard sources, risk assessment, and control work.

Formulate the annual work plan for occupational health and safety and organize its implementation.

Be responsible for the organization and management of occupational health and safety training.

Supervise the procurement, distribution, and use of labor protection articles.

Organize the implementation of occupational health monitoring work.

Formulate emergency response plans and organize emergency drills.

Be responsible for the reporting, investigation, and handling of accidents.

Be responsible for the management of occupational health and safety documents and records.

● Responsibilities of Various Departments

Implement the company's occupational health and safety management system and fulfill the occupational health and safety management responsibilities of the department.

Organize employees of the department to receive occupational health and safety training to improve their safety awareness and operational skills.



Conduct daily management and control of hazard sources in the department, and promptly discover and eliminate potential safety hazards.

Supervise employees of the department to correctly use labor protection articles.

In case of an accident, report it promptly, organize rescue efforts, and cooperate with the accident investigation and handling work.

- **Responsibilities of Employees**

Abide by the company's occupational health and safety management system and operating procedures, and obey management.

Actively participate in occupational health and safety training, and master the safety knowledge and operational skills of their posts.

Correctly use and maintain labor protection articles, and promptly report any damage or failure.

Promptly report potential safety hazards or occupational hazard factors to the department head or the Occupational Health and Safety Management Office.

In case of an accident, immediately take emergency measures and report to relevant personnel.

3. Identification, Risk Assessment, and Control of Hazard Sources

(1) Identification of Hazard Sources

- The company regularly organizes various departments to comprehensively identify hazard sources in the production and operation process, including but not limited to the following aspects:

Harmful gases and contact hazards that may be generated by chemicals such as glue and solvents used in shoemaking.

Mechanical injuries that may be caused by equipment used in processes such as cutting, sewing, and shaping, such as shearing, extrusion, and winding.

Physical factors such as dust, noise, and vibration in the workshop.

Electric shock injuries that may be caused by electrical equipment.

Falling injuries that may be caused by working at heights.

Dangers such as fire and explosion.

- Methods such as on-site observation, data review, employee interviews, and work hazard analysis can be used for hazard source identification.

(2) Risk Assessment

- For the identified hazard sources, risk assessment shall be conducted in accordance with the specified evaluation standards to determine the risk level.
- Risk assessment shall consider the possibility of hazard sources and the severity of consequences, and be divided into three levels: high, medium, and low.

(4) Risk Control

- For hazard sources with high risk levels, control measures shall be taken immediately to eliminate or reduce risks, such as improving processes, replacing equipment, and strengthening protection.
- For hazard sources with medium risk levels, a control plan shall be formulated, specifying the responsible person and the completion time, to gradually reduce risks.
- For hazard sources with low risk levels, regular monitoring shall be conducted to ensure that risks are in a controllable state.
- Priority shall be given to engineering and technical measures for risk control, followed by management measures and personal protection measures.

4. Laws, Regulations, and Other Requirements

(1) Collection and Identification of Laws and Regulations

- The Occupational Health and Safety Management Office is responsible for collecting national and local laws, regulations, standards, and other requirements on occupational health and safety, and updating them in a timely manner.
- Identify the collected laws, regulations, and other requirements to determine their applicability and specific requirements for the company.

(2) Implementation and Compliance Evaluation of Laws and Regulations

- The company shall integrate relevant contents of laws, regulations, and other requirements into the occupational health and safety management system and operating procedures, and organize employees to study and implement them.

- Regularly evaluate the compliance of the company's occupational health and safety management work, check whether it complies with the provisions of laws, regulations, and other requirements, and promptly take corrective measures for non-compliance.

5. Occupational Health and Safety Training

(1) Training Plan

The Occupational Health and Safety Management Office formulates an annual occupational health and safety training plan according to the actual situation of the company and the needs of employees, specifying the training content, objects, time, methods, and assessment methods.

(2) Training Content

The training content includes but is not limited to the following aspects:

- National laws and regulations on occupational health and safety and the company's occupational health and safety management system.
- Hazard sources and control measures of the post.
- Correct use and maintenance methods of labor protection articles.
- Safety operating procedures and emergency handling measures.
- Knowledge of occupational disease prevention and control.

(3) Training Objects and Methods

- Training objects include new employees, transferred employees, interns, external construction personnel, etc.
- Training methods can adopt various forms such as centralized teaching, on-site teaching, case analysis, video training, and practical operation drills.

(4) Training Assessment

After the training, employees shall be assessed, and they can take up their posts only after passing the assessment. Employees who fail the assessment shall receive supplementary training and re-examination until they pass.

(5) Training Records

The Occupational Health and Safety Management Office shall establish training files, recording information such as training content, time, place, participants, and assessment results for reference.

6. Management of Labor Protection Articles

(1) Procurement

- The material supply department is responsible for the procurement of labor protection articles, and shall select suppliers with corresponding qualifications to ensure that the purchased labor protection articles meet national standards and industry standards.
- The purchased labor protection articles shall have product qualification certificates, inspection reports, and other materials.

(2) Distribution

- Each department shall submit an application for the distribution of labor protection articles to the Occupational Health and Safety Management Office according to the work posts and work needs of employees.
- After the review by the Occupational Health and Safety Management Office, notify the material supply department to distribute the labor protection articles.
- Employees shall sign for confirmation when receiving labor protection articles, and the material supply department shall establish distribution records.

(3) Use and Maintenance

- Employees shall correctly use labor protection articles and wear and maintain them in accordance with the instructions.
- Department heads shall supervise employees to correctly use labor protection articles and promptly correct any violations.
- When labor protection articles are damaged or invalid, employees shall promptly report to the department head, who shall uniformly replace them.

(4) Scrap

Labor protection articles that can no longer be used shall be scrapped in accordance with regulations and shall not be discarded at will.

7. Occupational Health Monitoring

(1) Health Examination

- The company organizes employees to undergo pre-employment, in-service, and post-employment occupational health examinations in accordance with relevant national regulations.

- Occupational health examinations shall be undertaken by qualified medical institutions, and the examination items shall be determined according to the employees' work posts and occupational hazard factors.
- The results of occupational health examinations shall be promptly fed back to the employees themselves and stored in the employees' occupational health files.

(2) Occupational Health Files

- The Occupational Health and Safety Management Office establishes occupational health files for each employee, including basic information of employees, occupational history, exposure history to occupational hazards, results of occupational health examinations, diagnosis and treatment of occupational diseases, etc.
- Occupational health files shall be properly kept, and the retention period shall be in accordance with relevant national regulations.

(3) Prevention and Control of Occupational Diseases

- For employees suspected of having occupational diseases, the company shall promptly arrange for diagnosis; for employees diagnosed with occupational diseases, the company shall provide treatment, rehabilitation, and placement in accordance with relevant national regulations.
- The company shall take effective measures to prevent and control the occurrence of occupational diseases and improve the working environment and labor conditions of employees.

8. Emergency Preparedness and Response

(1) Formulation of Emergency Response Plans

- The Occupational Health and Safety Management Office formulates corresponding emergency response plans according to the company's hazard sources and possible emergencies, including but not limited to emergency plans for accidents such as fire, explosion, chemical leakage, mechanical injury, electric shock, and occupational disease hazards.
- Emergency response plans shall specify the emergency organization, responsibilities, emergency procedures, emergency materials, emergency drills, etc.

(2) Reserve of Emergency Materials

The company shall reserve necessary emergency materials according to the requirements of the emergency response plan, such as fire extinguishers, first-aid medicines, protective articles,

emergency lighting, etc., and conduct regular inspections and maintenance to ensure that the emergency materials are in good condition and effective.

(3) Emergency Drills

- The Occupational Health and Safety Management Office regularly organizes emergency drills, with at least one comprehensive emergency drill every year and special emergency drills for different types of emergencies.
- Relevant departments and employees shall be invited to participate in emergency drills. After the drill, a summary and evaluation shall be conducted, and the plan shall be revised and improved according to the drill situation.

(4) Emergency Response

In case of an emergency, the emergency response plan shall be activated immediately, and personnel shall be organized for rescue, evacuation, and vigilance to prevent the expansion of the accident. At the same time, the accident situation shall be promptly reported to relevant departments.

9. Accident Reporting, Investigation, and Handling

(1) Accident Reporting

- In case of an occupational health and safety accident, the parties or witnesses shall immediately report to the department head or the Occupational Health and Safety Management Office.
- After receiving the report, the department head or the Occupational Health and Safety Management Office shall immediately report to the company's leadership and report to the relevant local government departments within the specified time limit and requirements.
- The accident report shall include the time, place, casualties, and a brief description of the accident.

(2) Accident Investigation

- The company establishes an accident investigation team to investigate the accident. The accident investigation team is composed of company leaders, the Occupational Health and Safety Management Office, heads of relevant departments, and professional and technical personnel.
- The accident investigation shall find out the cause, process, casualties, and property losses of the accident, and determine the nature and responsibility of the accident.

- The accident investigation team shall collect relevant evidence, including on-site photos, videos, witness testimonies, equipment data, operating procedures, etc.

(3) Accident Handling

- Based on the results of the accident investigation, the responsible units and persons for the accident shall be handled, and corresponding penalties shall be given in accordance with the company's reward and punishment system.
- For the casualties caused by the accident, treatment, compensation, and placement shall be carried out in accordance with relevant national regulations.
- Formulate preventive measures against the causes of the accident to prevent similar accidents from happening again.
- The results of the accident handling shall be announced to all employees to learn lessons and strengthen safety management.

10. Document and Record Management

(1) Document Management

- Occupational health and safety management documents include management systems, operating procedures, emergency response plans, laws and regulations, etc., which are uniformly managed by the Occupational Health and Safety Management Office.
- The formulation, approval, distribution, revision, and cancellation of documents shall be carried out in accordance with specified procedures to ensure the validity and uniformity of documents.
- Various departments shall properly keep the occupational health and safety management documents used by the department and shall not arbitrarily alter, lose, or damage them.

(2) Record Management

- Occupational health and safety management records include training records, inspection records, hazard source identification records, risk assessment records, occupational health examination records, accident reporting and handling records, emergency drill records, etc.
- Records shall be filled in a timely, accurate, and complete manner, and be kept by designated personnel. The retention period shall be in accordance with relevant national regulations.
- The review and copying of records shall be carried out in accordance with specified procedures to ensure the safety and confidentiality of records.

11. Internal Audit and Management Review

(1) Internal Audit

- The company conducts at least one internal audit of the occupational health and safety management system every year, which is organized and implemented by the Occupational Health and Safety Management Office.
- The internal audit shall be carried out in accordance with the audit plan and audit criteria, check the operation of the occupational health and safety management system, and promptly put forward rectification suggestions if problems are found.
- The audit results shall form an audit report and be submitted to the company's leadership and relevant departments.

(2) Management Review

- The company conducts at least one occupational health and safety management review every year, which is presided over by the general manager and attended by the heads of various departments.
- The management review shall evaluate the suitability, adequacy, and effectiveness of the occupational health and safety management system, including the realization of occupational health and safety policies and objectives, internal audit results, compliance with laws and regulations, accident handling, improvement suggestions, etc.
- The results of the management review shall form a review report, determining improvement measures and work plans for the next step.

12. Supplementary Provisions

(1) Right of Interpretation of the System

This system shall be interpreted by the company's Occupational Health and Safety Management Office.

(2) Revision of the System

This system shall be revised in a timely manner according to changes in national laws and regulations and the actual situation of the company.

(3) Effective Date

This system shall come into effect as of the date of issuance.